

How can consistent accessibility and inclusion practice become part of public sector operational culture?

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Introduction



We have a passion for inclusive communications. This interest started many years ago for us as communication professionals. Our passion developed as part of our experience in the public and third sector. And as fellow human beings!

Building an inclusive culture that supports accessible best practices is hard to do. For this research, we interviewed colleagues in the public sector. We set out to identify the challenges professionals face when attempting to do this. We will highlight some of the practical and psychological challenges.

We understand how challenging this change can be. We have led initiatives to make content more inclusive. We have done this in organisations where accessibility is not a strategic priority. This type of environment makes it even more challenging to create an inclusive culture. Our expertise focuses on digital content. In our opinion, all content should be inclusive and accessible.

This topic is wide and complex. Even the language is complex. Accessibility is often associated with websites. And sometimes social media. But the aim is to be more than accessible – to be inclusive of everyone. And that is why we prefer the phrase "inclusive content".

In this paper, inclusive content includes:

- digital content (news stories, newsletters, social media)
- websites
- digital publications

Our interviewees play a role in the operational delivery of inclusive content. As a result, in our interviews, we focused on:

- operational culture
- executive sponsorship
- resources

- skills
- individuals as a catalyst for change

We do not explore workforce equality, diversity and inclusion (EDI) practices.

We have found themes about why operational consistency is difficult to achieve. The strategic and operational support that is required is huge. Improving an organisation's approach to inclusive content is not easy. And it is not the responsibility of a few passionate professionals.

But in a few organisations, there has been success. These organisations had senior leadership support. It was clear who that leader was. Leadership prioritised inclusion activities and made investments. These organisations had a culture of inclusivity. Responsibility moved away from passionate individuals. Communication teams were no longer solely responsible. Inclusive practice became everyone's responsibility.

We would like to thank our research supervisor Stephen Waddington for his support. Thanks to Ruth Dale for her initial advice and for helping us scope out this project. Most importantly, we thank our interview participants.

Leanne Hughes and Kim Tooke

February 2024

Executive summary





A HTML version of this report is available at www.inclusive-communications.com

This research examined the barriers and opportunities to create an organisational culture of accessibility and inclusion in public sector communications.

The UK public sector must comply with accessibility legislation such as the Public Sector Bodies Regulations 2018. However, many organisations have not met the regulations as of February 2024. They face challenges in making communications accessible and inclusive.

We undertook a qualitative study. It included desk research and eight semistructured interviews with public sector professionals. Through our study, we identified four major themes:

Organisational culture

An underlying culture of inclusivity facilitates better accessibility practices. More diverse leadership and inclusive values enable progress.

Leadership sponsorship

Clear executive-level sponsorship and priorities around accessibility make a significant difference. This includes leadership, accountability and resourcing.

Operational responsibility

Accessibility cannot fall solely on communications teams. A crossorganisational, coordinated effort is essential for consistency.

Individual change agents

Passionate individuals drive initial accessibility improvements but need organisational support for real change. There are risks of depleted resilience.

We recommend national coordination across public sector bodies. This would allow organisations to share guidance, resources and training programs at scale. The Central Digital & Data Office should also enforce compliance more actively through the risk of reputational damage or fines.

Creating systemic change requires investing in external expertise and technology tools. It also requires integrating accessibility across policymaking, processes and teams. This comes down to leadership commitment, priority-setting and establishing clear accountability.

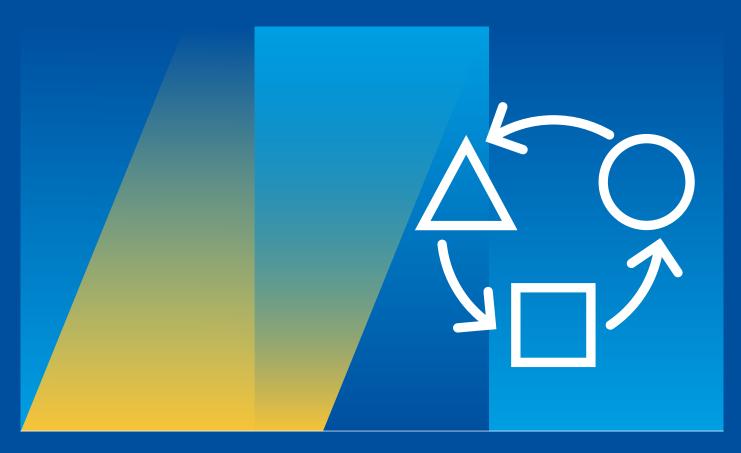
Context

Across the public sector, communication teams are responsible for meeting accessibility legislation.

Often, this is without senior leadership support. In our discussions, we explored the role senior leaders played in creating a culture of inclusivity. We found that support for accessibility best practices is often lacking. This is because of:

- lack of resource
- competing demands for other strategic priorities
- fear of getting it wrong
- no senior-level sponsorship

We sought views from individuals who want to foster an accessible culture but have been unable to achieve this. And from those that have been successful.



Method

Our method included:

- desk research
- scoping interviews
- qualitative semi-structured interviews

Desk research

We started our research by examining perceived barriers. What barriers made it hard for organisations to embed accessibility into their culture? We undertook desk research to identify literature related to the topic.

Scoping interviews

We conducted a small number of qualitative scoping interviews. Interviewees had experience of the research topic in their professional roles. These interviews helped us:

- develop a semi-structured interview format
- identify interview questions

We used the interviews to explore the list of perceived barriers. Our aim was to ensure it was comprehensive and unbiased.

Qualitative semi-structured interviews

We conducted eight qualitative, semi-structured interviews. We recruited the interviewees by asking for help in a peer-to-peer social media group. All participants work in the public sector. They work in health, local government, regional councils, local councils, housing and the charity sector. Their job roles include:

- digital design manager
- senior communications/PR professionals
- senior digital services manager
- behaviour science specialist

We used AI and transcription software to record the interviews. The technology helped us theme the responses.

Interview questions:

- Tell us about your organisation's approach to accessibility.
- Where does accessibility responsibility sit within your organisation?
- How have you trained staff members about your accessible approach?
- Do you know how accessibility came to be prioritised within your organisation? What steps/activities were taken to gain executive-level support?
- What challenges did the team face?
- Can you share any information on the policies followed?
- How is your personal resilience after being involved in influencing an accessible approach within your organisation?



Desk research findings



Digital accessibility background

Public sector organisations in the UK must follow accessibility laws. About 1 in 5 people in the UK have a long-term illness, impairment or disability. 20% of the UK population benefits when content is inclusive. The number of people who can benefit increases when you include:

- temporary needs (for example a broken arm or reduced vision)
- situational needs (for example poor lighting or background noise)
- neurodiversity

The UK government has passed two laws relevant to this research:

- The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (PSBAR 2018)
- Equality Act 2010

The laws help ensure everyone can engage with public sector websites and mobile apps. The Central Digital and Data Office (CDDO) has responsibility for monitoring compliance.

The 2010 Equality Act replaced the Disability Discrimination Act 1995. The Equality Act is often associated with employee rights. Section 20 requires service providers to make "reasonable adjustments" online. Under both acts, intranets should be accessible. This is to ensure all employees can access information.

Also relevant is the UK Equality and Human Rights Commission (EHRC)'s <u>Code of Practice on Services</u>, <u>Public Functions and Associations</u>. It sets out what service providers need to do to make their content accessible and avoid discrimination. It reinforces that public sector websites and mobile apps must be accessible. Failure to do so is a breach of the Equalities Act 2010.

The Web Content Accessibility Guidelines (WCAG) 2.2 sets the digital standards. The guidelines include four key areas:

- perceivable (users must be able to perceive the information)
- operable (the user interface and navigation must be operable)
- understandable (users must be able to understand the information and how to use the user interface)
- robust (content must be robust enough to be interpreted by a wide range of users and assistive technologies)

An accessibility statement is also required. It should say how accessible that platform is. It should also share how to report any accessibility issues.

Some organisations may be exempt. This is usually due to a disproportionate burden. An accessibility statement is still required.

Perceived barriers

In 2021, the CDDO reported on how well the public sector has applied the accessibility regulations. Public sector organisations reported the following barriers:

- lack of awareness about the regulations (55%)
- funding issues (53%)
- lack of accessibility training (52%)
- needing more accessibility guidance (45%)
- difficulties collaborating with contractors (34%)

Only 34% have an in-house accessibility specialist. This means many organisations rely on external services. A lack of resources to fix website accessibility issues is another common barrier. For others, it was hard to motivate organisations to invest in accessibility. And in some cases, the organisation was unwilling to change.

Other forms of digital content make the situation more complex. Communications teams manage content across digital channels. But not all content has legal guidelines. Social media and newsletters are two examples. Social media and newsletters do not have to be inclusive. This can result in an inconsistent approach to communications.

We also found that a lack of leadership was a significant barrier. Priya Bates and Advita Patel's *Building a Culture of Inclusivity* book discusses how building leadership capacity can impact and influence cultural change. David Gibson (Accessibility.Works) also highlights leadership as a barrier. AbilityNet's 2023 survey found a lack of leadership to be a key barrier as well. 37% of respondents did not know where accessibility responsibility lay in their organisation. And 24% said there was little or no executive-level interest. AbilityNet's summary report shares more barriers:

- "Our accessibility teams are siloed and not coordinated centrally, with no central support for training."
- "We have a maturing accessibility practice. However, we constantly encounter people within the business who do not understand the value proposition and push back."
- "The engagement from senior management has been low. They say the right things but in action, they produce inaccessible documents."

Building inclusive cultures is a team effort. It requires leadership to influence change. And to build accessible practice into its operating model. This includes funding, staffing and training. And changing publishing processes and outputs. Lack of digital accessibility leadership is the most common barrier we found.

Findings from semi-structured interviews



We have identified four key themes in the interviews:

- organisational culture
- senior leadership sponsorship
- operational responsibility and resource
- the individual as a catalyst for change

Organisational culture

We found a direct link between an inclusive culture and content. We heard that organisations with an inclusive culture were able to improve content. As one participant who has seen improvement in their organisation said, "... it's the way we work now."

One participant reflected on a change to their executive team. The executive team had become more diverse. The impact on accessibility practice was transformational:

"We moved from having a senior management team who are all white, middle-aged, middle-class men, to a senior management team who are ethnically diverse. It's become a much more diverse management team. They are taking EDI and accessibility seriously. They can see the difference it makes.

"We work for residents. We need to understand and empathise with our residents. And have a workforce that is representative of them. [We need to consider] the barriers people might face to access services. And access information about those services."

There was no longer a question at a senior level about why this work should happen. Now there was a question of how it could happen. They resourced accessibility because it is "the right thing to do."

In another interview, we heard how a new chief executive built a culture that puts people's needs at the heart of the work. Operational improvements included:

- staff networks with a real voice to influence change
- robust policies and internal guidance
- inclusive language training for all staff

The organisation has not fixed everything. There are clear areas for future improvement. This includes improving the accessibility of content. But this organisation is on a positive journey. This is a notable example of an inclusive organisational culture having a positive impact on content.

In less inclusive organisations, some made improvements. 25% of interviewees made improvements to mitigate an operational risk. For example, the threat of an accessibility audit from the CDDO.

Senior leadership sponsorship

Senior leadership who supports an inclusive culture can make a real difference.

Organisations that put an inclusive approach in place had an appointed sponsor. It could be an EDI leader. Or it could be a member of an executive team who is the named accessibility sponsor. Staff need to know who is responsible. The sponsor needs to be accountable for progress at a senior level. This clarity will help deliver inclusive content.

Leaders need to have operational responsibility too. They need to support new internal processes. Internal processes can improve compliance. This means more content will be accessible. For example, website content cannot go live unless it meets WCAG guidelines. Support from leaders is important to staff who are responsible for delivery. Staff need to feel supported if they are to push back on inaccessible content. For example, the use of too many images or an image not having alt-text.

"We have an equality and diversity lead who's been incredibly supportive of accessibility initiatives. [They have made] the organisation aware of its responsibilities. That's something that has been really helpful – getting us visibility at an executive level."

Processes are better when teams work in a joined-up way. We heard how digital service developers worked with the EDI lead. Regular planning sessions lead to improved content. It is important to highlight the value of operational teams having access to the sponsor. When there is a direct link, it is easier for teams to influence. It can also reduce frustration in operational teams.

Operational responsibility and resource

How an organisation operates is important too. Organisations that adopted accessibility had:

- a cross-organisational approach
- clear roles and responsibilities
- invested in training programmes

Cross-organisational approach

Communications teams are often responsible for accessibility. This was common practice in our desk research as well. This is because the outputs are:

- a form of communication or
- published on a website

The communications team usually shares outputs. So, it is easy for responsibility to fall on a communications team. They oversee the last steps of the publication process. But interviewees said it was impossible for only one team to be responsible.

"We had to acknowledge from the beginning that it had to be everybody's business. And not something that the comms team did."

A key challenge is that other teams create some of the digital outputs. It is harder to make an output accessible at the end of a process. Outputs need to be created with accessibility in mind from the start.

"It costs six times more to fix accessibility issues...than it is to sort them out at the beginning." Accessibility Scotland Conference 2023

There is no "perfect way" to create a digital output. Accessible practice requires consideration from many perspectives. It is complex. Accessibility is an evolving practice. It requires a continuous improvement approach. This is why any one team will struggle to hold full responsibility.

We heard about a cross-organisational approach when there was success. This was a direct response of leadership support. Leaders knew that every team must help create an accessible culture. Knowing this leads to clear roles and responsibilities.

"I got to the stage where I wanted to hand over responsibility so that people took it seriously. "[A member of another team] is responsible for accessibility compliance. It has meant that it's seen as something that we need to do, rather than something that comms is just banging on about. And [not] something people can switch off if they don't want to engage with it."

Clear roles and responsibilities

Everyone has a role to play when it comes to creating a culture of accessibility. And this starts with executive teams. There needs to be a clear executive lead. Their role is to make accessibility a priority. They also set out roles and responsibilities.

The "why" is essential to creating an inclusive culture. Accessible practice helps people feel included. We heard how EDI teams have a role in sharing the why. EDI staff networks can also help with culture.

Most teams play a role in the creation of digital outputs. Thus, all teams need accessibility training. Learning and development teams are particularly important. They can put training programmes in place. They can also promote a culture of improvement. The involvement of IT teams is necessary. They ensure that websites and apps use technology that is accessible. Communications teams are important too. They often track changes in best practice. And if responsible for a website, they can publish content in an accessible way.

Investment in training

Interviewees shared their training experiences. All interviewees expressed how important training was. Organisations with an accessible culture prioritised training. They hired experts to train staff. Continuous learning was also important. In some cases, there was training for new employees or those moving into new roles.

These organisations also made time investments. Staff had time to do training and continuous learning. Projects had time to plan an accessible approach. Money and time investments are essential.

In unsuccessful situations, there was not a clear training plan. The value of accessibility expertise was not understood. In some situations, communications teams felt responsible. In the absence of a plan or external expertise, they filled the training gap. They developed and delivered training. They were not given training on how to do this. And in some cases, the team had not received any accessibility training. In most instances, individuals were self-taught. Accessible practice was not seen as a specialist skill.

The individual as a catalyst for change

The importance of the individual as a catalyst for change was another theme. We asked where the drive for improvement started. Most participants thought they played a key role. They became a catalyst for change through:

- increasing their own knowledge and skills
- advocacy
- tenacity and drive to see the change through

The participants demonstrated high levels of commitment. They persisted, no matter how small the level of buy-in would be.

The above led to discussions on how to influence change. Common reflections included:

- personal drive
- tone of voice
- behaviour change principles

There were reflections on how complex the change was. This complexity made it harder to influence. We added a follow-up question to our discussions. We realised that influencing on this scale is challenging. We asked interviewees how being a catalyst for change affected their resilience.

Personal drive

The interview sample had a bias. We selected participants for their accessibility experience. We wanted to know more about why they were advocates of accessibility. And how they brought this passion into their work context. All participants understand that meeting the needs of all users is "...the right thing to do."

Some individuals had personal accessibility requirements. Some had friends and family with accessibility needs. This was often the reason for their initial interest. Empathy was a major motivation. They recognised that people have diverse needs. This realisation resulted in an individual drive for change.

The introduction of <u>PSBAR 2018</u> had an impact on the majority of the participants. The guidelines were clear for those in digital development and design roles. WCAG set out the technical guidance for websites and apps. For others, the direct impact on roles was unclear. But the individual's passion and intention to serve the public as a public sector worker motivated them. They had the drive to use their role to make content more inclusive.

Tone of voice

In the scoping interviews, we asked for reflections on potential barriers. One response focused on influencing others to adopt a best-practice approach. These approaches can be "a bit too earnest". And people can feel "like [they are] being told off". Accessibility aims to reduce inequalities. So, it is unsurprising that tone and language can often be emotive.

Being aware of personal tone came up in the main interviews as well. The individuals knew they needed an effective approach to influence change. Many participants recognised they had not always got it right in the past. Some may have been too "shouty". Or, as one participant said, they may have been seen as the "grumpy old woman in the corner".

"I started off trying not to be preachy and nag. But I probably was a bit with the hashtags and the camel case stuff, saying, 'please do this. This is why.' And it had no impact, really."

Behaviour change principles

All interviewees adopted a slower, and more realistic, approach to change. They realised how important it was to "bring people along with them". One example is using a "show not tell" approach in conversations and training. This was a more effective way to create change:

"I sent around a video of camel case and non-camel case hashtags being read out by a screen reader. I got a flurry of emails back from people commenting, 'oh, that's awful. I had no idea. This is really bad.'

"I thought, okay, all I've done is show people this is what it's like. It's helped them to understand and empathise. And so that's the approach that I've taken throughout this. I've also tried to make it fun."

One participant used an external partner to influence change. They had service users from the Royal National Institute of Blind (RNIB) feedback on content. Feedback from the RNIB helped one participant to get their team of developers onboard. The result was a consistent approach to accessibility across the team:

"It was a real soul-searching day because you were sitting looking at things that we knew we'd cut corners on. You weren't feeling quite so chipper when somebody was in the room having a problem with it."

One individual reflected on advice for those starting their journeys. Empathy mapping and finding a point of understanding is vital, in their opinion. Along with patience. They recommended the use of a <u>COM-B</u> <u>approach</u> in advance of conversations. This can help with buy-in across all levels of seniority.

Personal resilience

The ability of individuals to drive change was impressive. The scale of what needs to change is huge. We wanted to understand the impact on their personal resilience. What impact did a change programme have on them?

The individuals faced a myriad of barriers:

- lack of awareness and support
- the pressure of managing stakeholders
- plain language debates
- the use of PDFs
- differing content design approaches
- lack of training

The list goes on and on.

Those in a speciality role, such as a graphic designer or software developer, reported their resilience as okay. They experienced the challenges of accessibility delivery and change. But their areas of responsibility and influence were clearly defined.

There were a few positive personal moments along the way. Participants were proud of the change they influenced. And saw great value in being an expert:

"In that moment when someone gets [it], the change isn't that hard. You know that what they're gonna be doing is fifty per cent not one hundred percent better than what was happening before.

So, you know that person has made that change. That they'll always be looking at the structure of the document whether you're there or not. You kind of think it's like a, you know, like a little ripple effect."

For those driving the change, they reported their resilience as "depleted". The years of influencing and driving change took its toll.

"I'm not sure if I could do it all again at this point if I'm honest."

Leaders need to watch the resilience of individuals driving change. And ensure change programmes have clear roles and appropriate levels of support.



Discussion points



The below discussion points came up in some of the interviews. They give insights into what may be affecting progress. They also consider local versus national approaches.

A national approach to leadership and policy

We heard there was little guidance at a national level. Health boards and councils had to come up with their own approach, according to interviewees. They had to develop plans, policies, training and roles and responsibilities. Local organisations paid for expert training. Technical support for websites was also bought in. Local organisations were duplicating efforts. A national approach would benefit the NHS and councils. Pooling resources could save them time and money. It would also be beneficial to share learnings on a larger scale.

Accessibility is bigger than individual organisations. We heard that local organisations want national guidance. They also welcome practical support. A national approach to leadership and policy could benefit the public sector.

Response to risk

How leaders respond to risk was a discussion point. Executive teams make decisions based on risk. This includes both operational and reputational risks. Public sector organisations have a responsibility to follow the law. So why isn't accessibility a priority?

"I think in lots of organisations, the struggle to have accessibility taken seriously is because comms isn't taken seriously."

GDPR vs PSBAR

PSBAR and the <u>Data Protection Act 2018</u> (the UK's version of GDPR) became law in 2018. Several interviewees compared these two pieces of legislation. And the approach their organisations took to the legislation. It was quite different. Most organisations set up a dedicated team to prepare for GDPR. Staff received training and guidance. None of the organisations the interviewees spoke about had done the same for accessibility. GDPR rules are clearer. Compliance is straightforward. As mentioned above, accessibility is complex. There are many facets to accessibility compliance. Accessibility is harder to put in place. This may be one reason a similar approach was not taken.

Technology is a consideration when discussing GDPR and PSBAR. GDPR applies to all sectors, including the private sector. The private sector had a business response to GDPR. Tech companies built GDPR into their tools. For example, newsletter tools ensure individuals have given consent to use the tool. When it comes to accessibility, technology cannot fix bad content. A website can have accessibility features, but that does not make it compliant. Content does not have a technology solution. People are responsible for content. This makes it harder for organisations to be compliant.

No perceived risk

We heard that the perceived risk of accessibility is low. The UK Government clearly states that the CDDO has a remit to audit public sector websites. They have the power to enforce compliance in a short period of time. But there are no known instances of financial penalties for noncompliance. Nor are there known risks to organisational reputation. In contrast, there are clear penalties for not complying with GDPR. It is easy to google and read about GDPR fines. Our desk research was unable to find an organisation that had been fined for accessibility. If there was a perceived risk, more organisations might try to comply. This theory is an interesting area for further research.

Key findings for success and driving change

1. Senior leadership can make a real difference.

There should be a named person responsible for accessibility. Culture, resourcing, training and a consistent approach are key responsibilities.

2. An inclusive culture is important for success.

Everyone has a role to play when it comes to creating a culture of accessibility. Having an underlying culture of inclusivity can help set the organisation up for success.

3. Organisations need a cross-organisational approach.

Accessible practice is an organisation-wide responsibility.

4. Organisations need clear roles and responsibilities.

Teams need to understand how they help create an accessible culture. And what responsibilities come with that role. The communications team is not solely responsible.

5. Individuals need support.

Those with operational responsibilities will need executive-level support. They may need support to influence across the organisation. Individuals who have been catalysts for change cannot deliver change on their own. Leaders also need to keep an eye on the resilience of individuals.

Recommendations

1. Larger organisations should have a national approach.

Resources and support for delivery are lacking at a local level. There is duplication of efforts and costs at a local level. A national approach has the potential to be more effective, cheaper and consistent for the public.

2. The CDDO should engage more with executive teams.

Executive teams need to understand the risk of non-compliance. Understanding the impact on staff and potential fines may encourage compliance.

3. For systemic change, the public sector needs more resources.

Accessibility is complex. The public sector needs external support and resources. Private sector support and investment may help.

Future research

Useful resources

We identified potential areas of research:

- 1. A comparison of accessible practice in non-territorial and territorial NHS boards. This research did not include territorial boards.
- 2. A comparison of local councils. Some councils have had success. There could be learnings between those that have and have not embedded accessibility.
- 3. A case study comparing NHS boards and local councils. Local councils communicate with the public on digital channels. As a result, they appear to have a more accessible approach.
- 4. A case study of the transformational change that took place to move accessibility from the communications team to a cross-organisational responsibility.

- Accessible Social
- Content Design London
- Plain English Weekly (newsletter)
- Public sector comms headspace (Facebook group)



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